REMARKS

Claims 1-20 are pending in the present application. No claims were added, no claims were amended, and no claims were canceled. Reconsideration of the claims is respectfully requested.

I.   Examiner Interview

Applicants thank Examiner Patel for all the courtesies extended Applicants' representative during the August 10, 2005 telephone interview. During the interview, Applicants' representative discussed the prior art of record and the manner in which *Chen et al.* fails to teach or disclose the features recited in the presently claimed invention in independent claims 1, 11, and 17. The arguments discussed as well as additional reasons that the claims are not anticipated are set forth in the remarks below.

II.   35 U.S.C. § 102, Anticipation: Claims 1-20

The examiner has rejected claims 1-20 under 35 U.S.C. § 102(e) as being anticipated by Chen et al. (U.S. Patent Publication No. 2003/0022679) (hereinafter *"Chen"*). This rejection is respectfully traversed.

The examiner states on page 3 of the Office Action that:

> As to claims 1, 11 and 17, Chen teaches the invention including a method, a system and a computer program for automatically converting date and time information in a text message to a local date and time of a message recipient in a network of data processing systems, the method comprising the steps of: sending a text message from a first location in a first time zone, said text message intended for a recipient located in a second time zone, said text message including a string of at least one of date information and time information is taught as the method for automatically adjusting time difference of the device related to the location of the time zone (see, abstract and figure 2); identifying said second time zone (see, figure 2 and paragraph [003]); and converting said string of at least one of date information and time information to a second string, said second string including said at least one of date information and time information formatted with at least one of a date format and a time format associated with said second time zone (see, abstract and figures 1-2 and paragraphs [0009]-[0011]).

Office Action dated June 8, 2005, pages 3-4

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. In re Bond, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir.

1990). All limitations of the claimed invention must be considered when determining patentability. In re Lowry, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches. Kalman v. Kimberly-Clark Corp., 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983). In this case, *Chen* does not identically show each and every feature of the claims arranged as they are in the claims.

Independent claim 1, which is representative of independent claims 11 and 17 with regard to similarly recited subject matter, claims as follows:

> 1.   A method for automatically converting date and time information in a text message to a local date and time of a message recipient in a network of data processing systems, the method comprising the steps of:
> sending a text message from a first location in a first time zone, said text message intended for a recipient located in a second time zone, said text message including a string of at least one of date information and time information;
> identifying said second time zone; and
> converting said string of at least one of date information and time information to a second string, said second string including said at least one of date information and time information formatted with at least one of a date format and a time format associated with said second time zone.

Chen does not teach "converting date and time information in a text message to a local date and time of a message recipient in a network," as recited in independent claim 1.

1.   Sending a text message.

Chen does not teach or disclose "converting a date and time information in a text message to a local date and time of a message recipient in a network of data processing systems, the method comprising the steps of: sending a text message from a first location in a first time zone, said text message intended for a recipient located in a second time zone, said text message including a string of at least one of date and time information," as is recited in independent claim 1. The Examiner alleges this feature is taught by *Chen* as the method for automatically adjusting time difference of the device related to the location of the time zone at *Chen* abstract and figure 2. *Chen* teaches as follows:

> In a cellular phone having a memory with a data base for storing a time conversion table regarding time of one place in the world belonging to a first telephone system and corresponding time of the other place in the

world belonging to a second telephone system different from the first one, a method for automatically adjusting a time difference between the cellular phone and a connected base station during an international roaming comprises the steps of when a CPU of the cellular phone determines that an associated telephone system is different from that of the connected base station, the telephone system accessing the data base and looking up the conversion table for retrieving a corresponding time of the connected base station with respect to the cellular phone; and showing the corresponding time as a local time on a display of the cellular phone.

Chen, Abstract, page 1.

As shown above, the abstract merely teaches adjusting the current local time on a cellular phone display when a cell phone user roams outside of their home telephone system cell and connects to a base station in a different time zone from that of the cellular telephone system. *Chen* discloses that a CPU of the cellular phone may access a data base and look up a conversion table for retrieving the local time of the connected base station and display the time of the connected base station as the current local time on the mobile phone display. However, *Chen* does not teach or disclose "converting date and time information in a text message" or "sending a text message from a first time zone intended for a recipient in a second time zone," as claimed in claim 1.
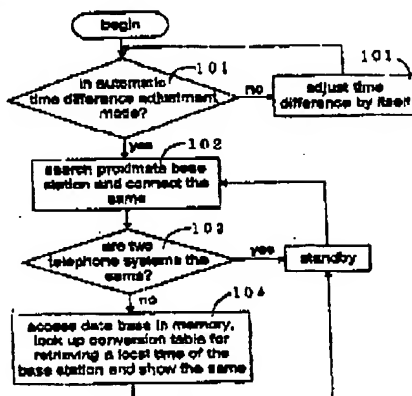
Figure 2 of *Chen* teaches:

Fig. 2

Chen, Figure 2.

Figure 2 of *Chen* merely illustrates that if a cellular phone is in automatic time difference adjustment mode, the cell phone will connect to the new proximate base station, determine if the

two telephone systems are the same, and retrieve the local time of the base station for display on the user's cell phone. In other words, this figure teaches how to display time on mobile phone, but has nothing to do with date and time information included in a text message. Thus, figure 2 of *Chen* fails to teach or disclose "converting date and time information in a text message to a local date and time of a message recipient," as is recited in claim 1.

In contradistinction, the presently claimed invention in independent claim 1 **converts date and time information in a text message to a local date and time of a message recipient** where a text message that includes date and time information is sent from a first time zone to an intended recipient in a second time zone. Thus, when a client sends a message from Central Time Zone to recipient in Eastern Time Zone saying "Call me at 1:00PM," the date and time information in the text message would be converted to the local date and time of the message recipient to read, for example, "Call me at 2:00PM." However, as shown above, the cited portions of *Chen* merely teach converting the **current time display on a cell phone** to the local time of a connected base station where the cell phone user is roaming outside of the home system time zone.

Chen teaches:

> [0009]   FIG. 2 is a flow chart illustrating a processing according to the invention. Firstly, a person initiates an international roaming by turning on cellular phone. Then CPU 13 may perform the following steps: In step 101, determine whether an automatic time difference adjustment mode is activated. If yes, process goes to step 102. Otherwise, user does the time difference adjustment by oneself with the adjusted time shown on display 15 of cellular phone thereafter. In step 102, search a proximate base station and connect the same once found. In step 103, determine whether a telephone system associated with the cellular phone is the same as that associated with the connected base station of the cellular phone. If yes, process goes to standby mode and loops back to step 102. If not, process goes to step 104. In step 104, telephone system associated with the cellular phone will access the data base in memory 11 of cellular phone and look up the conversion table therein in order to retrieve a corresponding local time of the connected base station with respect to the cellular phone. Such obtained local time then is shown on a display 15 of cellular phone. Process then goes to standby mode and loops back to step 102.

Chen, paragraph [0009].

Here, *Chen* describes adjusting the time difference between a cell phone's home telephone system and a connected base station for display of the current local time on a cell phone when the cell phone user is roaming. The cell phone system retrieves the current **local time for the connected base station where the user is roaming** and displays the local time on the user's cell phone display. However, *Chen* does not teach sending a text message including a string with a date and/or time information to a recipient in a second time zone. In fact, *Chen* does not even mention a string including a date and/or time information in a text message. Nor does *Chen* teach or discuss sending a text message of any kind to a recipient in a second time zone. Although *Chen* may teach retrieving the local time of a connected base station for display on the cell phone, such teachings are insufficient to teach or disclose "sending a text message from a first location in a first time zone, said text message intended for a recipient in a second time zone, said text message including a string of at least one of date information and time information." Thus, *Chen* fails to teach or disclose "sending a text message from a first location in a first time zone, said text message intended for a recipient located in a second time zone, said text message including a string of at least one of date information and time information," as is recited in claim 1.

2. Identifying the second time zone.

Moreover, *Chen* does not teach or disclose "identifying said second time zone," as is recited in independent claim 1. The Examiner believes this feature is taught by *Chen* at figure 2 and paragraph [003]. The cited portion of *Chen* teaches as follows:

> [0003] It is therefore an object of the present invention to provide, in a cellular phone having a memory with an embedded data base for storing a time conversion table regarding information about time of one of a plurality of places in the world belonging to a first telephone system and a corresponding time of the other place in the world belonging to a second telephone system different from the first telephone system, a method for automatically adjusting a time difference between the cellular phone and a connected base station during an international roaming comprising the steps of (a) when a central processing unit (CPU) of the cellular phone determines that an associated telephone system is different from that of the connected base station, the telephone system associated with the cellular phone accessing the data base and looking up the conversion table for retrieving a corresponding time of the connected base station with respect to the cellular phone; and (b) showing the corresponding time as a local time on a display of the cellular phone. By commanding CPU to identify two telephone system having different time zones, it is possible of

automatically converting time of a cellular phone international roaming into a local time when connected to a base station in a different time zone.

Chen, paragraph [0003].

The cited portion of *Chen* merely teaches identifying two telephone systems having different time zones, for example, the time zone of the cell phone's home telephone system and the time zone of the connected base station where the cell phone user is roaming. *Chen* discloses displaying the local time of the connected base station as the current local time on the user's cell phone display. *Chen* does not teach identifying the second time zone of an intended recipient of a text message sent from a first time zone. In contradistinction, the presently claimed invention in independent claim 1 claims "identifying said second time zone" for an intended recipient of the text message containing the date and/or time information.

3. Converting the string of at least one of date and time information to a second string.

Chen does not teach or disclose "converting said string of at least one of date information and time information to a second string, said second string including at least one of date information and time information formatted with at least one of a date format and a time format associated with said second time zone," as is recited in independent claim 1. The Examiner believes this feature is taught by *Chen* at abstract and figures 1-2 and paragraphs [0009]-[0011]. *Chen* teaches as follows:
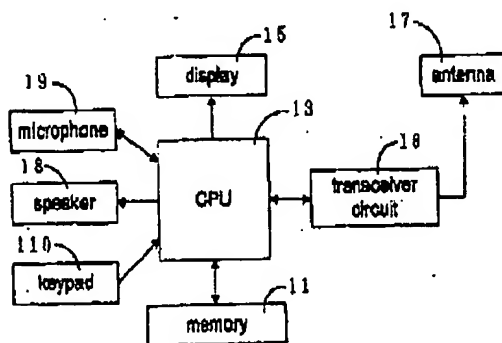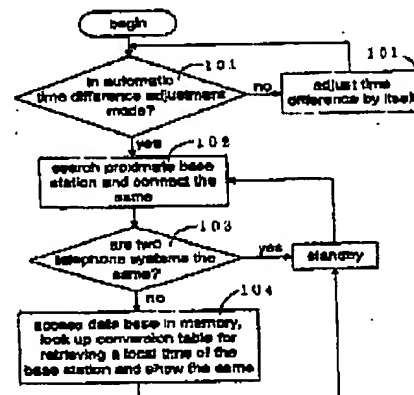

Fig. 1

Fig. 2

Chen, Figures 1 and 2.

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Figures 1 and 2 above merely illustrate that a CPU of a cellular phone may be connected to a microphone, speaker, keypad, memory, transceiver circuit and a display. If the cellular phone is in time difference adjustment mode and two telephone systems are not the same, the CPU may access a data base and look up conversion table for retrieving a local time of the connected base station. The cellular phone then displays the current local time for the connected base station where the user is roaming as the current local time on the cellular phone display. However, figures 1 and 2 do not illustrate converting a string of date and/or time information to a second string including date and/or time information formatted with the date format and/or time format associated with the second time zone of an intended recipient of the text message.

Chen also teaches as follows:

[0009]   FIG. 2 is a flow chart illustrating a processing according to the invention. Firstly, a person initiates an international roaming by turning on cellular phone. Then CPU 13 may perform the following steps: In step 101, determine whether an automatic time difference adjustment mode is activated. If yes, process goes to step 102. Otherwise, user does the time difference adjustment by oneself with the adjusted time shown on display 15 of cellular phone thereafter. In step 102, search a proximate base station and connect the same once found. In step 103, determine whether a telephone system associated with the cellular phone is the same as that associated with the connected base station of the cellular phone. If yes, process goes to standby mode and loops back to step 102. If not, process goes to step 104. In step 104, telephone system associated with the cellular phone will access the data base in memory 11 of cellular phone and look up the conversion table therein in order to retrieve a corresponding local time of the connected base station with respect to the cellular phone. Such obtained local time then is shown on a display 15 of cellular phone. Process then goes to standby mode and loops back to step 102.

[0010]   In brief, by commanding CPU to identify two telephone systems having different time zones, it is possible of automatically converting time of a cellular phone international roaming into a local time when connected to a base station in a different time zone. In another embodiment, the cellular phone may be replaced by a personal digital assistant (PDA).

[0011]   While the invention has been described by means of specific embodiments, numerous modifications and variations could be made thereto by those skilled in the art without departing from the scope and spirit of the invention set forth in the claims.

Chen, paragraphs [0009]-[0011].

As shown above, *Chen* merely teaches display of the current local time of a connected base station when a cell phone user roams outside of their home telephone system cell and into another telephone system cell in a different time zone. The cell phone retrieves the time of the connected base station and adjusts the time display on the user's cell phone to display the current local time of the connected base station. Although *Chen* teaches that a cell phone may be replaced by a personal digital assistant (PDA), the teachings of *Chen* would merely display the current local time on a display of the PDA rather than converting a date and/or time information in a text string sent by a user in a first time zone to a date and/or time information formatted with the date and/or time format associated with the second time zone of the intended recipient of the text message.

In contradistinction, the presently claimed invention recited in independent claim 1 claims "converting a string of at least one of date information and time information to a second string." *Chen* does not teach, disclose, or even mention converting a string of date and/or time information into a second string. Although *Chen* may teach identifying two telephone systems having different time zones and converting the time of a cell phone international roaming into a local time of a connected base station for display on the cell phone or PDA, *Chen* does not teach or disclose "converting a string of at least one of date information and time information to a second string," as is recited in claim 1.

Furthermore, *Chen* does not teach or disclose that the second string includes "at least one of date information and time information formatted with at least one of a date format and a time format associated with said second time zone." *Chen* merely teaches display of the local time for the connected base station on a cell phone display. *Chen* does not teach, disclose or even mention formatting the date and/or time information in a second string in a text message with the date format and/or time format associated with the second time zone for the intended recipient of the text message. Furthermore, as discussed above, *Chen* does not even mention a text message including a string of date and/or time information. Thus, *Chen* fails to teach or disclose "converting said string of at least one of date information and time information to a second string, said second string including at least one of date information and time information formatted with at least one of a date format and a time format associated with said second time zone," as is claimed in claim 1.

Thus, *Chen* fails to teach each and every claim limitation claimed in independent claim 1. Therefore, *Chen* does not anticipate the presently claimed invention in independent claim 1. Other rejected independent claims 11 and 17 recite subject matter addressed above with regard to independent claim 1 and are allowable over the prior art of reference under the same rationale set forth above with regard to independent claim 1.

4. Dependent Claims

At least by virtue of their dependency on independent claims 1, 11, and 17, dependent claims 2-10, 12-16, and 18-20 are not anticipated by *Chen*. In addition, claims 2-10, 12-16, and 18-20 recite additional features not taught or disclosed by *Chen*.

For example, in regard to claims 3, 13, and 19, the Examiner alleges this feature is taught at figures 1 and 2 and paragraphs [0009]-[0011], which are shown above. As can be seen, the figures and cited portions of *Chen* merely teach display of the current local time of a connected base station when a cell phone user roams outside of their home telephone system cell and into another telephone system cell in a different time zone. The figures and cited portions of *Chen* do not teach, disclose or even mention inserting a second string into a text message or sending a text message to a recipient in a second time zone. In contradistinction, the presently claimed invention in claims 3, 13, and 19 recites "inserting said second string in said text message; and sending said text message to said recipient located in said second time zone."

In regard to claims 4-8, 14-16, and 20, the Examiner states:

As to claims 4-8, 14-16 and 20, Chen teaches the method, the system and the computer program, wherein the identifying and converting are performed with an application program with at least one Java call function and wherein said text message comprises an instant message or email message (see, abstract and paragraphs [0007]-[0008]).

Office Action dated June 8, 2005, page 4.

Chen teaches as follows:

[0007] A method for automatically adjusting time difference of cellular phone international roaming is implemented by providing a data base in a memory 11 of cellular phone. Data base stores a time conversion table regarding information about time of one place in the world belonging to a first telephone system and a corresponding local time of another place in the world belonging to a second telephone system different from the first one. When a central processing unit (CPU) 13 of cellular phone

determines that a telephone system associated with a cellular phone international roaming is different from that associated with a connected base station (i.e., in different time zones), the telephone system associated with the cellular phone will access the data base in memory 11 of cellular phone and look up the conversion table therein in order to retrieve a corresponding local time of the connected base station with respect to the cellular phone. Such obtained local time then is shown on a display 15 of cellular phone.

[0008] Referring to FIG. 1, the circuitry incorporated in a cellular phone according to the invention comprises a CPU 13, an antenna 17 for transmitting/receiving signals, a transceiver circuit 16 interconnecting antenna 17 and CPU 13 for permitting CPU 13 to communicate with a proximate base station, a speaker 18 for amplifying signals sent from CPU 13, and a microphone 19 for sending sound signals to CPU 13 for converting into telephone signals therein. The CPU 13 is capable of further transmitting such telephone signals to the proximate base station via transceiver circuit 16 and antenna 17. The circuitry further comprises a display 15 for display message sent from CPU 13, a memory 11 for storing data sent from CPU 13 and providing the same to CPU 13 as commanded, and a keypad 110 for user to input alpha-numeric characters.

Chen, paragraphs 0007-0008.

As is shown above, *Chen* merely teaches that a cell phone circuitry includes a CPU, an antenna, a transceiver circuit, a speaker, and a microphone. The CPU is capable of transmitting signals to the base station via the transceiver circuit and antenna. When the CPU determines that a telephone system associated with the cell phone international roaming is in a different time zone from the connected base station, the telephone system of the cell phone will retrieve local time of the connected base station for display on the cell phone. *Chen* does not teach a Java call function, an Application Program Interface, or a text message that comprises an instant message or an e-mail message, as is claimed in claims 4-8, 14-16, and 20. Thus, the cited portion of *Chen* fails to teach or disclose the features recited in dependent claims 4-8, 14-16, and 20.

Therefore, the rejection of claims 1-20 under 35 U.S.C. § 102(e) has been overcome.

Furthermore, *Chen* does not teach, suggest, or give any incentive to make the needed changes to reach the presently claimed invention. *Chen* actually teaches away from the presently claimed invention because it teaches a telephone system retrieves the local time of a connected base station and adjusts the time display on the user's cell phone to display the current local time of the connected base station when a cell phone user roams in another time zone as opposed to

converting date and time information in a text message to a local date and time of a message recipient, as in the presently claimed invention. Absent the examiner pointing out some teaching or incentive to implement *Chen* and converting date and time information in a text message to a local date and time of a message recipient, one of ordinary skill in the art would not be led to modify *Chen* to reach the present invention when the reference is examined as a whole. Absent some teaching, suggestion, or incentive to modify *Chen* in this manner, the presently claimed invention can be reached only through an improper use of hindsight using the applicants' disclosure as a template to make the necessary changes to reach the claimed invention.
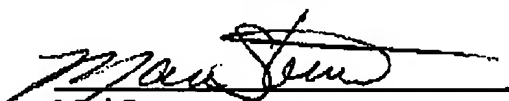
III.   Conclusion

It is respectfully urged that the subject application is patentable over *Chen* and is now in condition for allowance.

The examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: August 31, 2005

Respectfully submitted,

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